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IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 08-00004

Plaintiff,)

vs.)

**UNITED STATES PROPOSED
VOIR DIRE**

EUN YOUNG LEE,)
aka Eun Young Cho,)
aka Ina Lee,)
MARCELINO J. LASERNA,)
JOHN W.C. DUENAS,)
MARY C. GARCIA,)
JOSEPH PANGELINAN,)
FRANCISCO SN KAWAMOTO, and)
MARGARET B. UNTALAN,)
Defendants.)

Pursuant to the order of this Court and Federal Rule of Criminal Procedure 24(a), the
United States submits the following proposed voir dire questions.

A. WITNESSES (Assuming that the Court reads the names of the attorneys and the trial
witnesses to the panel.)

1. Are any of you friendly or associated or related with the attorneys for the
United States, or for the defense, in this case, either socially or through your role as jurors in
other cases? If so, please explain the nature of the prior knowledge and how it may affect your

1 attitude as a juror in this case.

2 2. Do any of you know any of the witnesses who will testify? If so, please
3 describe your acquaintance.

4 3. Do any of you know the defendants or their family members socially or
5 through some business or other acquaintanceship? If so, please describe the association.

6 B. GENERAL INFORMATION

7 4. The government requests that the court ask each juror to give a verbal
8 summary of the following information:

9 5. Please explain for us the nature and extent of your educational background,
10 including any special training courses and vocational seminars you have attended. If you
11 attended college, what was your major field of study?

12 6. Are you married? Do you: live alone? Share house with another person or
13 persons? Live with family?

14 7. Please describe the nature of your employment and that of your spouse, if you
15 are married.

16 8. Please describe your immediate family and, how each formally employed
17 member is employed, the nature of any past employment, and the educational background of
18 your immediate family.

19 9. Please explain your past experience on juries in both civil and criminal cases.
20 Tell us when the case was tried and the nature of the case.

21 10. Is there anything about the nature of this case, that involves the unlawful
22 issuance of Guam driver's licenses to illegal aliens, that makes you wish not to be involved in
23 the trial of this case? If so, what is it?

24 11. Do you have any personal objection to the laws of the United States
25 regulating the issuance of driver's licenses?

26 12. Have you or any of your acquaintances ever had any experiences with the
27 Federal Bureau of Investigation (FBI)? With the Guam Motor Vehicle Division?

1 13. Is there anything that you have read in newspapers, magazines, or viewed on
2 television regarding the arrest of the defendants, the search of their property, and the seizure of
3 stolen property, that would influence your ability to sit as a fair and impartial juror in this case?

4 C. OTHER MATTERS

5 14. Have you, your relatives or close friends ever been charged with or
6 investigated for a crime? If so, what was the nature of this investigation or charge? How was it
7 handled?

8 15. Do you know any reason whatsoever why you may not sit as a fair and
9 impartial juror to both sides in this case?

10 RESPECTFULLY SUBMITTED this 13th day of May, 2008.

11 LEONARDO M. RAPADAS
12 United States Attorney
13 Districts of Guam and NMI

14 By: /s/ Karon V. Johnson
15 KARON V. JOHNSON
16 Assistant U.S. Attorney
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